

EXHIBIT 3



**IN THE UNITED STATES DISTRICT
COURT FOR THE EASTERN DISTRICT
OF TEXAS SHERMAN DIVISION**

MOBILITY WORKX, LLC,

Plaintiff,

v.

CELLCO PARTNERSHIP,
D/B/A VERIZON WIRELESS,

Defendants.

Civil Action No. 4:17-cv-00872-ALM

JURY TRIAL DEMANDED

**PLAINTIFF'S SUPPLEMENTAL RESPONSES TO DEFENDANT'S FIRST SET OF
REQUESTS FOR ADMISSION NUMBER 46 AND BEYOND TO PLAINTIFF**

Pursuant to Rules 26 and 36 of the Federal Rules of Civil Procedure, Plaintiff Mobility Workx ("Mobility" or "Plaintiff") hereby objects and responds to Defendant's First Set of Requests for Admission to Defendant ("Requests") served by Defendant Cellco Partnership D/B/A Verizon Wireless ("Verizon") on May 7, 2019.

RESERVATION OF RIGHTS

Plaintiff makes the objections and responses herein (collectively, the "Responses") in accordance with its interpretation and understanding of Defendant's Requests and in accordance with its current knowledge, understanding, and belief as to the facts and the information available to it as of the date of these Responses. If Defendant subsequently asserts an interpretation of any Request that differs from Plaintiff's understanding, Plaintiff reserves the right to rely at the trial or in other proceedings on documents and information in addition to

owners, officers, employees, consultants, representatives or other individuals because such definitions improperly seek to impose on Plaintiff an obligation to procure information that is not within its possession, custody or control. Plaintiff also objects to the definitions as including agents, such as attorneys, because those definitions improperly seek to impose on Plaintiff an obligation to procure information that is privileged and/or not within its possession, custody, or control. Plaintiff further objects to the definitions of the terms on the grounds that each (when in combination with the individual Request) seeks documents not relevant to any claim or defense in this litigation nor reasonably calculated to lead to discovery of admissible evidence. Plaintiff's Responses are on behalf of Defendant only.

RESPONSES AND OBJECTIONS TO REQUESTS FOR ADMISSION

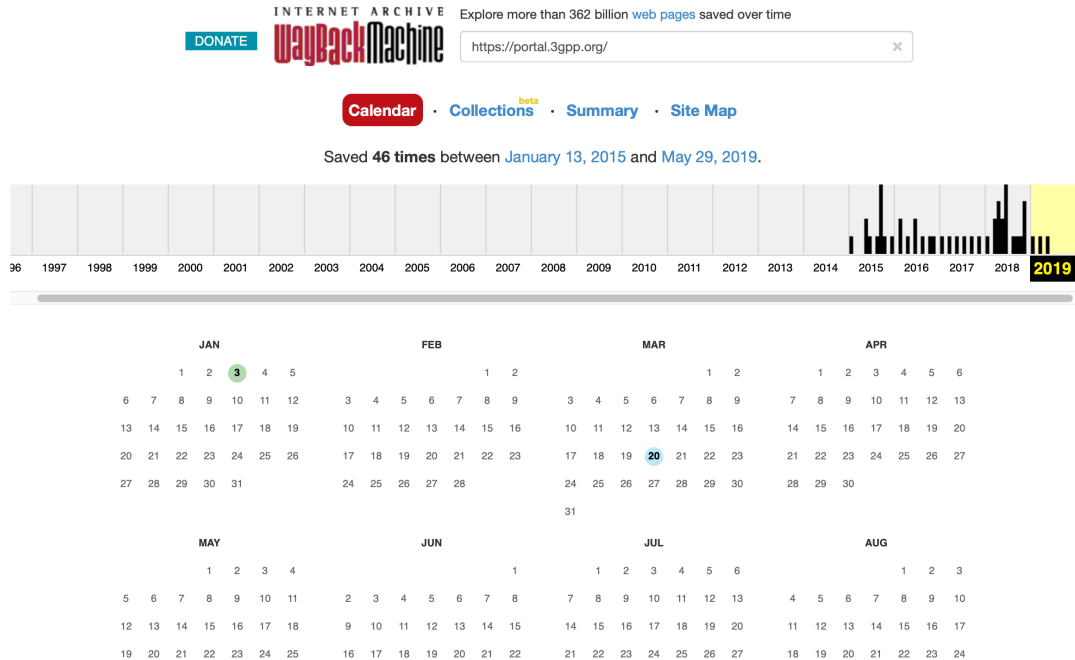
REQUEST FOR ADMISSION NO. 26:

Admit that VZ_MW_Prior Art_001770 to VZ_MW_Prior Art_001969 is a true and accurate copy of 3GPP Technical Specification 23.060 Version 5.1.0 (2002-03), *3rd Generation Partnership Project; Technical Specification Group Services and System Aspect; General Packet Radio Service (GPRS); Service description; Stage 2 (Release 5)*, published at <https://portal.3gpp.org/desktopmodules/Specifications/SpecificationDetails.aspx?specificationId=758> with an upload date of April 5, 2002.

RESPONSE TO REQUEST FOR ADMISSION NO. 26:

Objections: Vague and Ambiguous and Compound. Mobility is unable to confirm nor deny if that PDF is a true copy of anything. Moreover, Mobility is unable to confirm any upload date. The year in which portal.3gpp.org was created is 2013, so Mobility cannot confirm

any uploads or any dates if the site was created post 2002. See image below from Wayback Machine. Denied.



REQUEST FOR ADMISSION NO. 46:

Admit that VZ_MW_Prior Art_011615 to VZ_MW_Prior Art_011714 is a true and accurate copy of 3GPP Technical Report 25.931 Version 5.1.0 (2001-06), *3rd Generation Partnership Project; Technical Specification Group RAN; UTRAN Functions, Examples on Signalling Procedures (Release 5)*, published at <https://portal.3gpp.org/desktopmodules/Specifications/SpecificationDetails.aspx?specificationId=1353> with an upload date of June 28, 2002.

RESPONSE TO REQUEST FOR ADMISSION NO. 46:

Objections: Vague and Ambiguous and Compound. Mobility is unable to confirm nor deny if that PDF is a true copy of anything. Moreover, Mobility is unable to confirm any upload date. The year in which portal.3gpp.org was created is 2013, so Mobility cannot confirm any uploads or any dates if the site was created post 2002. See image above in Response to RFA 26. Denied.

REQUEST FOR ADMISSION NO. 47:

Admit that VZ_MW_Prior Art_011715 to VZ_MW_Prior Art_011749 is a true and accurate copy of 3GPP Technical Specification 25.401 Version 3.2.0 (2000-03), *3rd Generation Partnership Project; Technical Specification Group Radio Access Network; UTRAN Overall Description (Release 1999)*, published at <https://portal.3gpp.org/desktopmodules/Specifications/SpecificationDetails.aspx?specificationId=1184> with an upload date of March 15, 2000.

RESPONSE TO REQUEST FOR ADMISSION NO. 47:

Objections: Vague and Ambiguous and Compound. Mobility is unable to confirm nor deny if that PDF is a true copy of anything. Moreover, Mobility is unable to confirm any upload date. The year in which portal.3gpp.org was created is 2013, so Mobility cannot confirm any uploads or any dates if the site was created post 2002. See image above in Response to RFA 26. Denied.

REQUEST FOR ADMISSION NO. 48:

Admit that VZ_MW_Prior Art_012589 to VZ_MW_Prior Art_012769 is a true and accurate copy of 3GPP Technical Specification 23.060 Version 3.5.0 (2000-10), *3rd Generation Partnership Project; Technical Specification Group Services and System Aspect; General Packet Radio Service (GPRS); Service description; Stage 2 (Release 1999)*, published at

REQUEST FOR ADMISSION NO. 53:

Admit that VZ_MW_Prior Art_012129 to VZ_MW_Prior Art_012144 is a true and accurate copy of an article published in ACM SIGCOMM Computer Communications Review in 2003 entitled “NIST Net – A Linux-based Network Emulation Tool.”

RESPONSE TO REQUEST FOR ADMISSION NO. 53:

Objections: Vague and Ambiguous and Compound. Mobility is unable to confirm nor deny if that PDF is a true copy of anything. Assuming the document is genuine and the date is accurate, admitted.

REQUEST FOR ADMISSION NO.54:

Admit that VZ_MW_Prior Art_012119 to VZ_MW_Prior Art_012124 is a true and accurate copy of an article published in 2003 entitled “EWANT: The Emulated Wireless Ad Hoc Network Testbed.

RESPONSE TO REQUEST FOR ADMISSION NO. 54:

Objections: Vague and Ambiguous and Compound. Mobility is unable to confirm nor deny if that PDF is a true copy of anything. Assuming the document is genuine and the date is accurate, admitted.

REQUEST FOR ADMISSION NO. 43:

Admit that VZ_MW_0019112 to VZ_MW_0019127 is a true and accurate copy of 3GPP Technical Report 21.902 Version 6.0.0 (2003-09), *3rd Generation Partnership Project; Technical Specification Group Services and System Aspect; Evolution of 3GPP System; (Release 6)*, published at <https://portal.3gpp.org/desktopmodules/Specifications/SpecificationDetails.aspx?specificationId=556> with an upload date of September 26, 2003.

RESPONSE TO REQUEST FOR ADMISSION NO. 43: